

Commonwealth of Kentucky
Natural Resources and Environmental Protection Cabinet
Department for Environmental Protection
Division for Air Quality
803 Schenkel Lane
Frankfort, Kentucky 40601
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AIR QUALITY PERMIT

Permittee Name: Sumitomo Electric Magnet Wire America, Inc.
Mailing Address: 909 Industrial Drive, Edmonton, Kentucky 42129

Source Name: Sumitomo Electric Magnet Wire America, Inc.
Mailing Address: 909 Industrial Drive
Edmonton, Kentucky 42129

Source Location: 909 Industrial Drive, Edmonton, Kentucky

Permit Type: Federally-Enforceable Part 70
Review Type: Title V, Synthetic Minor

Permit Number: V-00-034
Log Number: E817
Application
Complete Date: February 15, 1997

AFS Plant ID #: 21-169-00008
SIC Code: 3357

Region: South Central
County: Metcalfe

Issuance Date: November 28, 2000
Expiration Date: November 28, 2005

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SECTION A - PERMIT AUTHORIZATION

Pursuant to a duly submitted application which was determined to be complete on February 15, 1997, the Kentucky Division for Air Quality hereby authorizes the construction/operation of the equipment described herein in accordance with the terms and conditions of this permit. This permit has been issued under the provisions of Kentucky Revised Statutes Chapter 224 and regulations promulgated pursuant thereto.

The permittee shall not construct, reconstruct, or modify any affected facilities without first having submitted a complete application and receiving a permit for the planned activity from the permitting authority, except as provided in this permit or in the Regulation 401 KAR 50:035, Permits.

Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by this Cabinet or any other federal, state, or local agency.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS

EP01 and EP02 These emission points are Medium Enameling Magnet Wire Machines.
(EV-01 and EV-02)

Copper wire enters each of these machines, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the winding portion of the machine (depending on the number of coats desired and applied), and finally is wound for shipment.

EV-01 consists of 6 lines or heads. Heads 01 and 06 may coat up to 2 wires each by passing the wires through the applicator multiple times. Heads 02 and 05 may coat up to 3 wires each by passing the wires through the applicator multiple times. Heads 03 and 04 may coat up to 5 wires each by passing the wires through the applicator multiple times. The combined heads of EV-01 can produce a total of 20 insulated wires if fully utilized.

EV-02 consists of 4 lines or heads where 5 wires (20 total wires) may make multiple passes through the head to produce insulated wire.

The machines are designed to apply, cure, and cool the wire on a plane that is roughly perpendicular to the facility's floor.

Catalysts are utilized in each curing zone to reduce emissions and generate heat for the process. (Prior to permit issuance, the catalysts in these machines were assumed to have a 93.8% VOC destruction efficiency due to a stack test at EV-04.)

Electric heaters are utilized to generate any additional heat required in the curing zones.

EV-01 and EV-02 have a maximum throughput rate of 33 m/min for 1.20 mm diameter wire.

Wires with smaller diameters will have higher maximum throughput rates on all of these machines.

Each head of each machine is exhausted to the ambient air through an independent stack.

EV-01 construction commenced: October 1989.

EV-02 construction commenced: September 1991.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:190**, New insulation of magnet wire operations, exempts each affected facility in a county designated attainment commenced after June 29, 1979 but prior to June 24, 1992 except that control devices and procedures required at the time the facility commenced shall continue to be operated and maintained.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:**401 KAR 59:190**

The following limits shall apply to assure compliance with Emission Limitation #1.

1. Each curing zone shall be operated such that the minimum inlet temperature to the catalyst is at least 626° F.
2. Each curing zone shall be operated such that the maximum outlet temperature from the catalyst is no more than 1200° F.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:190**

3. Each head shall be operated only if each of the catalysts used in the head has been operated less than 6,000 hours from initial installation, regeneration by a catalyst reactivation service vendor, or catalyst replacement.
4. Each head shall be operated only when the enclosure around the applicator is in a configuration that has been used when demonstrating that airflow near the applicator is into the oven. (Attention should be focused on enclosure doors and changes to other openings in the enclosures.)
5. Each head shall be operated only if airflow near the applicator enclosure is into the enclosure.

Compliance Demonstration Method:

Initially this may be demonstrated quantitatively or qualitatively. Quantitative methods such as Method 204 will demonstrate compliance if less than 5% of the VOC input is exhausted through temporary total enclosures utilized with the applicator enclosure. Qualitative demonstration is much more difficult to define but the degree of control is intended to be equivalent to a 5% or less loss.

Quantitative measurement of line capture can be accomplished by measuring the VOCs input at the applicator, building temporary total enclosures around the applicator enclosure of a head, assuming 100% of the VOC emissions exit through the curing zone stacks or the temporary total enclosures, and performing tests to determine VOC emissions from the curing zone stacks and the temporary total enclosures.

Qualitative demonstration can be accomplished if solvent odors are minimal around each applicator enclosure and smoke from a smoke tube is drawn into the applicator enclosure. Given the odor threshold of the solvents used in the coatings and the smoke observations, capture equivalent to a 5% loss will be assumed. However, care should be exercised when observing smoke being drawn into the applicator enclosure. If possible, smoke should be puffed around the perimeter of openings in the applicator enclosure (ignoring holes smaller than 10 in²), smoke should not linger for more than a few seconds, and nearly all of the smoke should enter the applicator enclosure.

Subsequent demonstration is intended to be done by the following methods for each batch of wires ran on each head but an equivalent method approved by the division may be acceptable.

By measuring air velocity into the applicator enclosure during initial demonstration, ongoing compliance can be accomplished through measurement of air velocity at the same locations as air velocity measurements during initial compliance. If all air velocities are $> 0.90 \times$ the initial air velocity measurements, capture can be demonstrated to be equivalent to the initial demonstration through documentation of the air velocity measurements for each batch of wires ran on each head. Alternatively, the qualitative initial demonstration above may be performed and documented for each batch of wires ran on each head.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:010**

The following limit shall apply to assure compliance with Emission Limitations #2 and #3.

6. Machines shall be operated and maintained consistent with good air pollution control practices.

PSD VOC Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 49.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 52.

Emission Limitations:**401 KAR 59:190**

1. For these emission points, Section 2(2) requires controls (that were required at the time of construction or modification) to be operated and maintained. The permittee was and shall continue to be required to limit VOC discharge into the atmosphere to a maximum of 15% by weight of the total VOCs input into each coating line or head (including mixing and cleanup).

Compliance Demonstration Method:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

Where:

$$\begin{aligned} \text{VOC input} = & S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)} \\ & + S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} = & \text{line capture of VOCs x line control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)}] \\ & + \text{cleaning room capture of VOCs x cleaning room control device destruction efficiency} \\ & \times S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

Line capture of VOCs is either assumed to be 95% when Operating Limitation #5 is demonstrated qualitatively or as determined through quantitative measurements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method (Continued):**

Line control device destruction efficiency has been tested at EV-04 and assuming 95% capture efficiency, destruction efficiency was demonstrated to be 93.8% (see the statement of basis for raw data used in destruction efficiency determination or future recalculations without an assumed capture efficiency). Assuming that regenerated catalyst activity is always equal or lower for future testing, up to date test results shall be used in the above emission calculation.

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested. And,

$$\begin{aligned} \text{Lbs of cleaning solution used for the line} &= \text{total lbs of cleaning solution used} \\ &\times [\text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)}] \\ &/ [\text{S (lbs of coating input to all lines} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to all lines} \times \text{VOC weight \% of solvent)}]. \end{aligned}$$

401 KAR 59:010

2. Section 3(1) limits visible emissions from each stack to less than 20% opacity.
3. Section 3(2) limits emissions of particulate matter from each stack to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively. Otherwise, compliance with Operating Limitation #6 may be used to demonstrate compliance.

PSD VOC Synthetic Minor Limitation

See Section D, Emission Limitation #1 on pages 49 and 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Emission Limitation #1 on page 52.

Testing Requirements:**401 KAR 59:190**

See Section D, Testing Requirements for EV-01, EV-02, EV-03, and EV-04 on page 47.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Monitoring Requirements:****401 KAR 59:190**

The following is required as part of compliance demonstration for Operating Limitations #1 through #5.

1. Inlet temperature to the each catalyst shall be monitored continuously when in operation.
2. Outlet temperature from each catalyst shall be monitored continuously when in operation.
3. Hours of operation for each line shall be monitored daily.
4. Configuration of applicator enclosures shall be monitored daily.
5. Monitoring described in the compliance demonstration method for Operating Limitation #5 shall be performed for each batch of wires ran on each head.

Specific Record Keeping Requirements:**401 KAR 59:190**

The following is required in accordance with Section F #2 of this permit as part of compliance demonstration for Operating Limitations #1 through #5 and Emission Limitation #1.

1. Inlet temperature to each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Inlet temperature to each catalyst shall be recorded during the time the batch is processed.
2. Outlet temperature from each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Outlet temperature from each catalyst shall be recorded during the time the batch is processed.
3. Hours of operation prior to catalyst regeneration or replacement shall be recorded for each line.
4. All operating configuration changes of applicator enclosures (including open doors) shall be recorded when monitored (configuration changes occurring when the lines aren't in operation should not be recorded). Additionally, maintenance and the operating condition (good, slow, or not functioning) of door closing assistance mechanisms shall be recorded when performed and weekly, respectively.
5. All observations resulting from Specific Monitoring Requirement #5 shall be recorded and include a description of the monitoring, equipment used, location relative to the applicators and applicator enclosure opening of measurements or smoke, and any qualitative or quantitative measurements taken.
6. All results of Testing Requirements shall be recorded.
7. The regenerated catalyst activity of each curing zone shall be noted using reported performance characteristics furnished by the reactivation service vendor and tracked through serial numbers or other definitive means.
8. The amount and type of coating or solvent (including exempt compounds) used at each point of application shall be recorded daily unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
9. The VOC content of each coating or solvent shall be recorded.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Record Keeping Requirements (Continued):

401 KAR 59:190

10. The amount of cleanup or washup solvent (including exempt compounds) used and the VOC content of each shall be recorded daily unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
11. The lbs of cleaning solution used for each line shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
12. The weight percentage of VOCs emitted shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #2 and #3.

13. All maintenance on the above referenced machines shall be recorded.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 52.

Specific Reporting Requirements:

Deviations from permit requirements (including emissions in excess of permit limits from startups, shutdowns, and malfunctions) shall be reported in accordance with Section F #6 of this permit.

401 KAR 59:190

The following is required in accordance with Section F #5 of this permit as part of compliance demonstration for Emission Limitation #1.

1. Minimum catalyst inlet temperature for each curing zone shall be reported for each 6 month period.
2. Maximum catalyst outlet temperature for each curing zone shall be reported for each 6 month period.
3. Regenerated catalyst activity shall be reported for each curing zone if regeneration results are determined during the 6 month period.
4. All operating configuration changes of applicator enclosures (including open doors) shall be reported for the 6 month period (report none if no configuration changes have been noted). Additionally, report the operating condition of door closing assistance mechanisms and maintenance performed on the mechanisms.
5. All observations of insufficient capture for each application area shall be reported for the 6 month period (report none if all capture observations are adequate).
6. The maximum weight percentage of VOCs emitted shall be reported for each line during the 6 month period.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on pages 50 and 51.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on page 53.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Control Equipment Operating Conditions:

Catalytic oxidation systems are contained inside of the enameling ovens. Refer to Operating Limitations #1 - #5 for control equipment operating conditions.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP03 and EP04 These emission points are Medium Enameling Magnet Wire Machines.
(EV-03 and EV-04)

Copper wire enters each of these machines, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the winding portion of the machine (depending on the number of coats desired and applied), and finally is wound for shipment.

Each machine consists of 4 lines or heads where 5 wires (20 total wires on each machine) may make multiple passes through the head to produce insulated wire.

The machines are designed to apply, cure, and cool the wire on a plane that is roughly perpendicular to the facility's floor.

Catalysts are utilized in each curing zone to reduce emissions and generate heat for the process. [Prior to permit issuance, EV-04 demonstrated a VOC destruction efficiency of 93.8% (assuming 95% capture) and the catalysts in EV-03 have been assumed to have an equivalent VOC destruction efficiency due to the similarity in the machines.]

Electric heaters are utilized to generate any additional heat required in the curing zones.

EV-03 has a maximum throughput rate of 42 m/min for 1.20 mm diameter wire.

EV-04 has a maximum throughput rate of 46 m/min for 1.20 mm diameter wire.

Wires with smaller diameters will have higher maximum throughput rates on all of these machines.

Each head of each machine is exhausted to the ambient air through an independent stack.

EV-03 construction commenced: May 1995.

EV-04 construction commenced: December 1996.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:190**, New insulation of magnet wire operations, applies to each affected facility part of a major source in a county designated attainment commenced on or after June 24, 1992.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:**401 KAR 59:190**

The following limits shall apply to assure compliance with Emission Limitation #1.

1. Each curing zone shall be operated such that the minimum inlet temperature to the catalyst is at least 626° F.
2. Each curing zone shall be operated such that the maximum outlet temperature from the catalyst is no more than 1200° F.
3. Each head shall be operated only if each of the catalysts used in the head has been operated less than 6,000 hours from initial installation, regeneration by a catalyst reactivation service vendor, or catalyst replacement.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:190**

4. Each head shall be operated only when the enclosure around the applicator is in a configuration that has been used when demonstrating that airflow near the applicator is into the oven. (Attention should be focused on enclosure doors and changes to other openings in the enclosures.)
5. Each head shall be operated only if airflow near the applicator enclosure is into the enclosure.

Compliance Demonstration Method:

Initially this may be demonstrated quantitatively or qualitatively. Quantitative methods such as Method 204 will demonstrate compliance if less than 5% of the VOC input is exhausted through temporary total enclosures utilized with the applicator enclosure. Qualitative demonstration is much more difficult to define but the degree of control is intended to be equivalent to a 5% or less loss.

Quantitative measurement of line capture can be accomplished by measuring the VOCs input at the applicator, building temporary total enclosures around the applicator enclosure of a head, assuming 100% of the VOC emissions exit through the curing zone stacks or the temporary total enclosures, and performing tests to determine VOC emissions from the curing zone stacks and the temporary total enclosures.

Qualitative demonstration can be accomplished if solvent odors are minimal around each applicator enclosure and smoke from a smoke tube is drawn into the applicator enclosure. Given the odor threshold of the solvents used in the coatings and the smoke observations, capture equivalent to a 5% loss will be assumed. However, care should be exercised when observing smoke being drawn into the applicator enclosure. If possible, smoke should be puffed around the perimeter of openings in the applicator enclosure (ignoring holes smaller than 10 in²), smoke should not linger for more than a few seconds, and nearly all of the smoke should enter the applicator enclosure.

Subsequent demonstration is intended to be done by the following methods for each batch of wires ran on each head but an equivalent method approved by the division may be acceptable.

By measuring air velocity into the applicator enclosure during initial demonstration, ongoing compliance can be accomplished through measurement of air velocity at the same locations as air velocity measurements during initial compliance. If all air velocities are $> 0.90 \times$ the initial air velocity measurements, capture can be demonstrated to be equivalent to the initial demonstration through documentation of the air velocity measurements for each batch of wires ran on each head. Alternatively, the qualitative initial demonstration above may be performed and documented for each batch of wires ran on each head.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:010**

The following limit shall apply to assure compliance with Emission Limitations #2 and #3.

6. Machines shall be operated and maintained consistent with good air pollution control practices.

PSD VOC Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 49.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 52.

Emission Limitations:**401 KAR 59:190**

1. Section 3 limits VOC discharge into the atmosphere to a maximum of 15% by weight of the total VOCs input into each coating line or head (including mixing and cleanup).

Compliance Demonstration Method:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

Where:

$$\begin{aligned} \text{VOC input} = & S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)} \\ & + S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} = & \text{line capture of VOCs x line control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)}] \\ & + \text{cleaning room capture of VOCs x cleaning room control device destruction efficiency} \\ & \times S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

Line capture of VOCs is either assumed to be 95% when Operating Limitation #5 is demonstrated qualitatively or as determined through quantitative measurements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method (Continued):**

Line control device destruction efficiency has been tested at EV-04 and assuming 95% capture efficiency, destruction efficiency was demonstrated to be 93.8% (see the statement of basis for raw data used in destruction efficiency determination or future recalculations without an assumed capture efficiency). Assuming that regenerated catalyst activity is always equal or lower for future testing, up to date test results shall be used in the above emission calculation.

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested. And,

$$\begin{aligned} &\text{Lbs of cleaning solution used for the line} = \text{total lbs of cleaning solution used} \\ &\quad \times [\text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &\quad + \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)}] \\ &\quad / [\text{S (lbs of coating input to all lines} \times \text{VOC weight \% of coating)} \\ &\quad + \text{S (lbs of solvent input to all lines} \times \text{VOC weight \% of solvent)}]. \end{aligned}$$

401 KAR 59:010

2. Section 3(1) limits visible emissions from each stack to less than 20% opacity.
3. Section 3(2) limits emissions of particulate matter from each stack to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively. Otherwise, compliance with Operating Limitation #6 may be used to demonstrate compliance.

PSD VOC Synthetic Minor Limitation

See Section D, Emission Limitation #1 on pages 49 and 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Emission Limitation #1 on page 52.

Testing Requirements:**401 KAR 59:190**

See Section D, Testing Requirements for EV-01, EV-02, EV-03, and EV-04 on page 47.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Monitoring Requirements:****401 KAR 59:190**

The following is required as part of compliance demonstration for Operating Limitations #1 through #5.

1. Inlet temperature to the each catalyst shall be monitored continuously when in operation.
2. Outlet temperature from each catalyst shall be monitored continuously when in operation.
3. Hours of operation for each line shall be monitored daily.
4. Configuration of applicator enclosures shall be monitored daily.
5. Monitoring described in the compliance demonstration method for Operating Limitation #5 shall be performed for each batch of wires ran on each head.

Specific Record Keeping Requirements:**401 KAR 59:190**

The following is required in accordance with Section F #2 of this permit by Section 4(8) of 401 KAR 59:190 or as part of compliance demonstration for Operating Limitations #1 through #5 and Emission Limitation #1.

1. Inlet temperature to each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Inlet temperature to each catalyst shall be recorded during the time the batch is processed. [See 401 KAR 59:190 Section 4(8)(g) for regulation citation.]
2. Outlet temperature from each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Outlet temperature from each catalyst shall be recorded during the time the batch is processed. [See 401 KAR 59:190 Section 4(8)(g) for regulation citation.]
3. Hours of operation prior to catalyst regeneration or replacement shall be recorded for each line.
4. All operating configuration changes of applicator enclosures (including open doors) shall be recorded when monitored (configuration changes occurring when the lines aren't in operation should not be recorded). Additionally, maintenance and the operating condition (good, slow, or not functioning) of door closing assistance mechanisms shall be recorded when performed and weekly, respectively.
5. All observations resulting from Specific Monitoring Requirement #5 shall be recorded and include a description of the monitoring, equipment used, location relative to the applicators and applicator enclosure opening of measurements or smoke, and any qualitative or quantitative measurements taken.
6. All results of Testing Requirements shall be recorded.
7. The regenerated catalyst activity of each curing zone shall be noted using reported performance characteristics furnished by the reactivation service vendor and tracked through serial numbers or other definitive means.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Record Keeping Requirements (Continued):****401 KAR 59:190**

Requirements #8 - #12 shall be recorded daily unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA but even if a SIP revision is approved, the frequency must not exceed 30 days.

8. Daily records shall record the applicable administrative regulation number, application method, and substrate type [see 401 KAR 59:190 Sections 4(8)(a) and (b) for regulation citation].
9. The amount and type of coating or solvent (including exempt compounds) used at each point of application shall be recorded [see 401 KAR 59:190 Section 4(8)(c) for regulation citation].
10. The VOC content of each coating or solvent shall be recorded [see 401 KAR 59:190 Section 4(8)(d) for regulation citation].
11. The date each coating or solvent is applied shall be recorded [see 401 KAR 59:190 Section 4(8)(e) for regulation citation].
12. The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each shall be recorded [see 401 KAR 59:190 Section 4(8)(f) for regulation citation].
13. The lbs of cleaning solution used for each line shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
14. The weight percentage of VOCs emitted shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #2 and #3.

15. All maintenance on the above referenced machines shall be recorded.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 52.

Specific Reporting Requirements:

Deviations from permit requirements (including emissions in excess of permit limits from startups, shutdowns, and malfunctions) shall be reported in accordance with Section F #6 of this permit.

401 KAR 59:190

The following is required in accordance with Section F #5 of this permit as part of compliance demonstration for Emission Limitation #1.

1. Minimum catalyst inlet temperature for each curing zone shall be reported for each 6 month period.
2. Maximum catalyst outlet temperature for each curing zone shall be reported for each 6 month period.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements (Continued):

401 KAR 59:190

3. Regenerated catalyst activity shall be reported for each curing zone if regeneration results are determined during the 6 month period.
4. All operating configuration changes of applicator enclosures (including open doors) shall be reported for the 6 month period (report none if no configuration changes have been noted). Additionally, report the operating condition of door closing assistance mechanisms and maintenance performed on the mechanisms.
5. All observations of insufficient capture for each application area shall be reported for the 6 month period (report none if all capture observations are adequate).
6. The maximum weight percentage of VOCs emitted shall be reported for each line during the 6 month period.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on pages 50 and 51.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on page 53.

Specific Control Equipment Operating Conditions:

Catalytic oxidation systems are contained inside of the enameling ovens. Refer to Operating Limitations #1 - #5 for control equipment operating conditions.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP05 (EH-01) These emission points are Fine Enameling Magnet Wire Machines.

Copper wire enters each of these machines, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the winding portion of the machine (depending on the number of coats desired and applied), and finally is wound for shipment.

EH-01 consists of 4 lines or heads where 5 wires (20 total wires) may make multiple passes through the head to produce insulated wire.

The machine is designed to apply, cure, and cool the wire on a plane that is roughly horizontal to the facility's floor.

Catalysts are utilized in each curing zone to reduce emissions and generate heat for the process. (Prior to permit issuance, the catalysts in this machine were assumed to have a 99.3% VOC destruction efficiency due to the minimum data resulting from a stack test at EH-05.)

Electric heaters are utilized to generate any additional heat required in the curing zones.

EH-01 has a maximum throughput rate of 139 m/min for 0.33 mm diameter wire.

Wires with smaller diameters will have higher maximum throughput rates on the machine.

Each head of **EH-01** is exhausted to the ambient air through an independent stack.

EH-01 construction commenced: November 1989.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:190**, New insulation of magnet wire operations, exempts each affected facility in a county designated attainment commenced after June 29, 1979 but prior to June 24, 1992 except that control devices and procedures required at the time the facility commenced shall continue to be operated and maintained.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:**401 KAR 59:190**

The following limits shall apply to assure compliance with Emission Limitation #1.

1. Each curing zone shall be operated such that the minimum inlet temperature to the catalyst is at least 626° F.
2. Each curing zone shall be operated such that the maximum outlet temperature from the catalyst is no more than 1200° F.
3. Each head shall be operated only if each of the catalysts used in the head has been operated less than 6,000 hours from initial installation, regeneration by a catalyst reactivation service vendor, or catalyst replacement.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:190**

4. Air flow near the applicators shall be into the curing zones.

Compliance Demonstration Method:

Initially this may be demonstrated quantitatively or qualitatively. Quantitative methods such as Method 204 will demonstrate compliance if less than 5% of the VOC input is exhausted through temporary total enclosures surrounding the applicators. Qualitative demonstration is much more difficult to define but the degree of control is intended to be equivalent to a 5% or less loss.

Quantitative measurement of line capture can be accomplished by measuring the VOCs input at the applicator, building temporary total enclosures around the applicator portions of a head, assuming 100% of the VOC emissions exit through the curing zone stacks or the temporary total enclosures, and performing tests to determine VOC emissions from the curing zone stacks and the temporary total enclosures.

Qualitative demonstration can be accomplished if solvent odors are minimal around each applicator and smoke from a smoke tube is drawn into the curing zones. Given the odor threshold of the solvents used in the coatings and the smoke observations, capture equivalent to a 5% loss will be assumed. However, care should be exercised when observing smoke being drawn into the curing zones. If possible, smoke should be puffed around the perimeter of the applicators or the openings in the enclosures surrounding the applicators (ignoring holes smaller than 10 in²), smoke should not linger for more than a few seconds, and nearly all of the smoke should enter the curing zones.

Subsequent demonstration is intended to be done by the following methods for each batch of wires ran on each head but an equivalent method approved by the division may be acceptable. By measuring air velocity into the curing zones during initial demonstration, ongoing compliance can be accomplished through measurement of air velocity at the same locations as air velocity measurements during initial compliance. If all air velocities are $> 0.90 \times$ the initial air velocity measurements, capture can be demonstrated to be equivalent to the initial demonstration through documentation of the air velocity measurements for each batch of wires ran on each head. Alternatively, the qualitative initial demonstration above may be performed and documented for each batch of wires ran on each head.

401 KAR 59:010

The following limit shall apply to assure compliance with Emission Limitations #2 and #3.

5. Machines shall be operated and maintained consistent with good air pollution control practices.

PSD VOC Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 49.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 52.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations:****401 KAR 59:190**

1. For these emission points, Section 2(2) requires controls (that were required at the time of construction or modification) to be operated and maintained. The permittee was and shall continue to be required to limit VOC discharge into the atmosphere to a maximum of 15% by weight of the total VOCs input into each coating line or head (including mixing and cleanup).

Compliance Demonstration Method:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

Where:

$$\begin{aligned} \text{VOC input} = & S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)} \\ & + S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} = & \text{line capture of VOCs x line control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)}] \\ & + \text{cleaning room capture of VOCs x cleaning room control device destruction efficiency} \\ & \times S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

Line capture of VOCs is either assumed to be 95% when Operating Limitation #4 is demonstrated qualitatively or as determined through quantitative measurements.

Line control device destruction efficiency was determined at the base coat and top coat sections of EH-05 and assuming 95% capture efficiency, the lesser destruction efficiency demonstrated was 99.3% (see the statement of basis for raw data used in destruction efficiency determination or future recalculations without an assumed capture efficiency). Since these lines are similar to EH-05 but none of these lines have actually been tested, a conservative destruction efficiency of 99.3% has a reasonable basis at these lines (a higher value is questionable). Assuming that regenerated catalyst activity is always equal or lower for future testing, up to date test results shall be used in the above emission calculation.

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method (Continued):**

And,

Lbs of cleaning solution used for the line = total lbs of cleaning solution used
x [S (lbs of coating input to the line x VOC weight % of coating)
+ S (lbs of solvent input to the line x VOC weight % of solvent)]
/ [S (lbs of coating input to all lines x VOC weight % of coating)
+ S (lbs of solvent input to all lines x VOC weight % of solvent)].

401 KAR 59:010

2. Section 3(1) limits visible emissions from each stack to less than 20% opacity.
3. Section 3(2) limits emissions of particulate matter from each stack to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively. Otherwise, compliance with Operating Limitation #5 may be used to demonstrate compliance.

PSD VOC Synthetic Minor Limitation

See Section D, Emission Limitation #1 on pages 49 and 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Emission Limitation #1 on page 52.

Testing Requirements:**401 KAR 59:190 and 401 KAR 59:010**

See Section D, Testing Requirements for EH-01, EH-02, EH-03, EH-04, and EH-05 on page 48.

Specific Monitoring Requirements:**401 KAR 59:190**

The following is required as part of compliance demonstration for Operating Limitations #1 through #4.

1. Inlet temperature to the each catalyst shall be monitored continuously when in operation.
2. Outlet temperature from each catalyst shall be monitored continuously when in operation.
3. Hours of operation for each line shall be monitored daily.
4. Monitoring described in the compliance demonstration method for Operating Limitation #4 shall be performed for each batch of wires ran on each head.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Record Keeping Requirements:****401 KAR 59:190**

The following is required in accordance with Section F #2 of this permit as part of compliance demonstration for Operating Limitations #1 through #4 and Emission Limitation #1.

1. Inlet temperature to each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Inlet temperature to each catalyst shall be recorded during the time the batch is processed.
2. Outlet temperature from each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Outlet temperature from each catalyst shall be recorded during the time the batch is processed.
3. Hours of operation prior to catalyst regeneration or replacement shall be recorded for each line.
4. All observations resulting from Specific Monitoring Requirement #4 shall be recorded and include a description of the monitoring, equipment used, location relative to the applicators and applicator enclosure opening of measurements or smoke, and any qualitative or quantitative measurements taken.
5. All results of Testing Requirements shall be recorded.
6. The regenerated catalyst activity of each curing zone shall be noted using reported performance characteristics furnished by the reactivation service vendor and tracked through serial numbers or other definitive means.
7. The amount and type of coating or solvent (including exempt compounds) used at each point of application shall be recorded daily unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
8. The VOC content of each coating or solvent shall be recorded.
9. The amount of cleanup or washup solvent (including exempt compounds) used and the VOC content of each shall be recorded daily unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
10. The lbs of cleaning solution used for each line shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
11. The weight percentage of VOCs emitted shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #2 and #3.

12. All maintenance on the above referenced machines shall be recorded.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 52.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Reporting Requirements:**

Deviations from permit requirements (including emissions in excess of permit limits from startups, shutdowns, and malfunctions) shall be reported in accordance with Section F #6 of this permit.

401 KAR 59:190

The following is required in accordance with Section F #5 of this permit as part of compliance demonstration for Emission Limitation #1.

1. Minimum catalyst inlet temperature for each curing zone shall be reported for each 6 month period.
2. Maximum catalyst outlet temperature for each curing zone shall be reported for each 6 month period.
3. Regenerated catalyst activity shall be reported for each curing zone if regeneration results are determined during the 6 month period.
4. All observations of insufficient capture for each application area shall be reported for the 6 month period (report none if all capture observations are adequate).
5. The maximum weight percentage of VOCs emitted shall be reported for each line during the 6 month period.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on pages 50 and 51.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on page 53.

Specific Control Equipment Operating Conditions:

Catalytic oxidation systems are contained inside of the enameling ovens. Refer to Operating Limitations #1 - #4 for control equipment operating conditions.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

**EP06, EP07, EP08, and EP09
(EH-02, EH-03, EH-04, and EH-05)**

These emission points are Fine Enameling Magnet Wire Machines.

Copper wire enters **EH-02, EH-03, and heads 01 and 02 of EH-05** at the base coat section, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the top coat section (depending on the number of base coats desired and applied), in the top coat section is drawn through an applicator and dies so that a different coating of insulation is applied, passes through a curing zone and a cooling zone, either returns to the applicator or continues to the winding portion of the machine (depending on the number of top coats desired and applied), and finally is wound for shipment.

Copper wire enters **EH-04 and heads 03 and 04 of EH-05**, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the winding portion of the machine (depending on the number of coats desired and applied), and finally is wound for shipment.

Each machine consists of 4 lines or heads where 5 wires (20 total wires on each machine) may make multiple passes through the head to produce insulated wire. In **EH-02, EH-03, and heads 01 and 02 of EH-05** a base coat applicator and a top coat applicator section are present in each head. In **EH-04 and heads 03 and 04 of EH-05** only one applicator section is present in each head.

The machines are designed to apply, cure, and cool the wire on a plane that is roughly horizontal to the facility's floor.

Catalysts are utilized in each curing zone to reduce emissions and generate heat (see Emission Limitation #1 Compliance Demonstration Method for emission reduction estimates).

Electric heaters are utilized to generate any additional heat required in the curing zones.

EH-02 is being modified to have a maximum throughput rate of 139 m/min for 0.35 mm diameter wire.

Prior to the modification, the maximum throughput rate will be 86 m/min for 0.35 mm diameter wire.

EH-03 has a maximum throughput rate of 129 m/min for 0.35 mm diameter wire.

EH-04 has a maximum throughput rate of 139 m/min for 0.33 mm diameter wire.

Heads 01 and 02 of **EH-05** have a maximum throughput rate of 137 m/min for 0.35 mm diameter wire.

Heads 03 and 04 of **EH-05** have a maximum throughput rate of 139 m/min for 0.33 mm diameter wire.

Wires with smaller diameters will have higher maximum throughput rates on all of these machines.

Base coat heads 01 and 02 of **EH-02** are exhausted to the ambient air through a single stack. Base coat heads 03 and 04 of **EH-02** are exhausted to the ambient air through a single stack. Top coat heads 01 and 02 of **EH-02** are exhausted to the ambient air through a single stack. Top coat heads 03 and 04 of **EH-02** are exhausted to the ambient air through a single stack. (**EH-02** has a total of four stacks)

All other curing zones of each head of each machine are exhausted to the ambient air through an independent stack (**EH-04** has 4 stacks, **EH-05** has 6 stacks, and **EH-03** has 8 stacks).

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EH-02 construction commenced: May 1991 Modified: projected in late 2000.
EH-03 construction commenced: July 1994.
EH-04 construction commenced: August 1994.
EH-05 construction commenced: November 1996.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:190**, New insulation of magnet wire operations, applies to each affected facility part of a major source in a county designated attainment commenced on or after June 24, 1992.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:**401 KAR 59:190**

The following limits shall apply to assure compliance with Emission Limitation #1.

1. Each curing zone shall be operated such that the minimum inlet temperature to the catalyst is at least 626° F.
2. Each curing zone shall be operated such that the maximum outlet temperature from the catalyst is no more than 1200° F.
3. Each head shall be operated only if each of the catalysts used in the head has been operated less than 6,000 hours from initial installation, regeneration by a catalyst reactivation service vendor, or catalyst replacement.
4. Air flow near the applicators shall be into the curing zones.

Compliance Demonstration Method:

Initially this may be demonstrated quantitatively or qualitatively. Quantitative methods such as Method 204 will demonstrate compliance if less than 5% of the VOC input is exhausted through temporary total enclosures surrounding the applicators. Qualitative demonstration is much more difficult to define but the degree of control is intended to be equivalent to a 5% or less loss.

Quantitative measurement of line capture can be accomplished by measuring the VOCs input at the applicator, building temporary total enclosures around the applicator portions of a head, assuming 100% of the VOC emissions exit through the curing zone stacks or the temporary total enclosures, and performing tests to determine VOC emissions from the curing zone stacks and the temporary total enclosures.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method (Continued):**

Qualitative demonstration can be accomplished if solvent odors are minimal around each applicator and smoke from a smoke tube is drawn into the curing zones. Given the odor threshold of the solvents used in the coatings and the smoke observations, capture equivalent to a 5% loss will be assumed. However, care should be exercised when observing smoke being drawn into the curing zones. If possible, smoke should be puffed around the perimeter of the applicators or the openings in the enclosures surrounding the applicators (ignoring holes smaller than 10 in²), smoke should not linger for more than a few seconds, and nearly all of the smoke should enter the curing zones.

Subsequent demonstration is intended to be done by the following methods for each batch of wires ran on each head but an equivalent method approved by the division may be acceptable. By measuring air velocity into the curing zones during initial demonstration, ongoing compliance can be accomplished through measurement of air velocity at the same locations as air velocity measurements during initial compliance. If all air velocities are $> 0.90 \times$ the initial air velocity measurements, capture can be demonstrated to be equivalent to the initial demonstration through documentation of the air velocity measurements for each batch of wires ran on each head. Alternatively, the qualitative initial demonstration above may be performed and documented for each batch of wires ran on each head.

401 KAR 59:010

The following limit shall apply to assure compliance with Emission Limitations #2 and #3.

5. Machines shall be operated and maintained consistent with good air pollution control practices.

PSD VOC Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 49.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 52.

Emission Limitations:**401 KAR 59:190**

1. Section 3 limits VOC discharge into the atmosphere to a maximum of 15% by weight of the total VOCs input into each coating line or head (including mixing and cleanup).

Compliance Demonstration Method for EH-02, EH-03, and heads 01 and 02 of EH-05:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method for EH-02, EH-03, and heads 01 and 02 of EH-05 (Continued):**

Where:

$$\begin{aligned} \text{VOC input} = & S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)} \\ & + S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} = & \text{line capture of base coat section VOCs} \\ & \times \text{line base coat section control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the base coat section of the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the base coat section of the line x VOC weight \% of solvent)}] \\ & + \text{line capture of top coat section VOCs} \\ & \times \text{line top coat section control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the top coat section of the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the top coat section of the line x VOC weight \% of solvent)}] \\ & + \text{cleaning room capture of VOCs x cleaning room control device destruction efficiency} \\ & \times S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

Line capture of base coat and top coat VOCs is either assumed to be 95% when Operating Limitation #4 is demonstrated qualitatively or as determined through quantitative measurements.

Line base coat section control device destruction efficiency has been tested at EH-05 and assuming 95% capture efficiency, destruction efficiency for the base coat section of EH-05 was demonstrated to be 99.8% (see the statement of basis for raw data used in destruction efficiency determination or future recalculations without an assumed capture efficiency). Assuming that regenerated catalyst activity is always equal or lower for future testing, up to date test results shall be used in the above emission calculation even if the testing isn't done on the top coat section because of the similarity in the sections.

Line top coat section control device destruction efficiency has been tested at EH-05 and assuming 95% capture efficiency, destruction efficiency for the top coat section of EH-05 was demonstrated to be 99.3% (see the statement of basis for raw data used in destruction efficiency determination or future recalculations without an assumed capture efficiency). Assuming that regenerated catalyst activity is always equal or lower for future testing, up to date test results shall be used in the above emission calculation even if the testing isn't done on the base coat section because of the similarity in the sections.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method for EH-02, EH-03, and heads 01 and 02 of EH-05 (Continued):**

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested. And,

$$\begin{aligned} \text{Lbs of cleaning solution used for the line} &= \text{total lbs of cleaning solution used} \\ &\times [\text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)}] \\ &/ [\text{S (lbs of coating input to all lines} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to all lines} \times \text{VOC weight \% of solvent)}]. \end{aligned}$$

Compliance Demonstration Method for EH-04 and heads 03 and 04 of EH-05:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

Where:

$$\begin{aligned} \text{VOC input} &= \text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)} \\ &+ \text{S (lbs of cleaning solution used for the line} \times \text{VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} &= \text{line capture of VOCs} \times \text{line control device destruction efficiency} \\ &\times [\text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)}] \\ &+ \text{cleaning room capture of VOCs} \times \text{cleaning room control device destruction efficiency} \\ &\times \text{S (lbs of cleaning solution used for the line} \times \text{VOC weight \% of cleaning solution)} \end{aligned}$$

Line capture of VOCs is either assumed to be 95% when Operating Limitation #4 is demonstrated qualitatively or as determined through quantitative measurements.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method for EH-04 and heads 03 and 04 of EH-05 (Continued):**

Line control device destruction efficiency was determined at the base coat and top coat sections of EH-05 and assuming 95% capture efficiency, the lesser destruction efficiency demonstrated was 99.3% (see the statement of basis for raw data used in destruction efficiency determination or future recalculations without an assumed capture efficiency). Since these lines are similar to EH-05 but none of these lines have actually been tested, a conservative destruction efficiency of 99.3% has a reasonable basis at these lines (a higher value is questionable). Assuming that regenerated catalyst activity is always equal or lower for future testing, up to date test results shall be used in the above emission calculation.

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested. And,

$$\begin{aligned} \text{Lbs of cleaning solution used for the line} &= \text{total lbs of cleaning solution used} \\ &\times [\text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)}] \\ &/ [\text{S (lbs of coating input to all lines} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to all lines} \times \text{VOC weight \% of solvent)}]. \end{aligned}$$

401 KAR 59:010

2. Section 3(1) limits visible emissions from each stack to less than 20% opacity.
3. Section 3(2) limits emissions of particulate matter from each stack to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively. Otherwise, compliance with Operating Limitation #5 may be used to demonstrate compliance.

PSD VOC Synthetic Minor Limitation

See Section D, Emission Limitation #1 on pages 49 and 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Emission Limitation #1 on page 52.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Testing Requirements:****401 KAR 59:190**

See Section D, Testing Requirements for EH-01, EH-02, EH-03, EH-04, and EH-05 on page 48.

Specific Monitoring Requirements:**401 KAR 59:190**

The following is required as part of compliance demonstration for Operating Limitations #1 through #4.

1. Inlet temperature to the each catalyst shall be monitored continuously when in operation.
2. Outlet temperature from each catalyst shall be monitored continuously when in operation.
3. Hours of operation for each line shall be monitored daily.
4. Monitoring described in the compliance demonstration method for Operating Limitation #4 shall be performed for each batch of wires ran on each head.

Specific Record Keeping Requirements:**401 KAR 59:190**

The following is required in accordance with Section F #2 of this permit by Section 4(8) of 401 KAR 59:190 or as part of compliance demonstration for Operating Limitations #1 through #4 and Emission Limitation #1.

1. Inlet temperature to each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Inlet temperature to each catalyst shall be recorded during the time the batch is processed. [See 401 KAR 59:190 Section 4(8)(g) for regulation citation.]
2. Outlet temperature from each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time. Outlet temperature from each catalyst shall be recorded during the time the batch is processed. [See 401 KAR 59:190 Section 4(8)(g) for regulation citation.]
3. Hours of operation prior to catalyst regeneration or replacement shall be recorded for each line.
4. All observations resulting from Specific Monitoring Requirement #4 shall be recorded and include a description of the monitoring, equipment used, location relative to the applicators of measurements or smoke, and any qualitative or quantitative measurements taken.
5. All results of Testing Requirements shall be recorded.
6. The regenerated catalyst activity of each curing zone shall be noted using reported performance characteristics furnished by the reactivation service vendor and tracked through serial numbers or other definitive means.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Record Keeping Requirements (Continued):****401 KAR 59:190**

Requirements #7 - #11 shall be recorded daily unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA but even if a SIP revision is approved, the frequency must not exceed 30 days.

7. Daily records shall record the applicable administrative regulation number, application method, and substrate type [see 401 KAR 59:190 Sections 4(8)(a) and (b) for regulation citation].
8. The amount and type of coating or solvent (including exempt compounds) used at each point of application shall be recorded [see 401 KAR 59:190 Section 4(8)(c) for regulation citation].
9. The VOC content of each coating or solvent shall be recorded [see 401 KAR 59:190 Section 4(8)(d) for regulation citation].
10. The date each coating or solvent is applied shall be recorded [see 401 KAR 59:190 Section 4(8)(e) for regulation citation].
11. The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each shall be recorded [see 401 KAR 59:190 Section 4(8)(f) for regulation citation].
12. The lbs of cleaning solution used for each line shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
13. The weight percentage of VOCs emitted shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #2 and #3.

14. All maintenance on the above referenced machines shall be recorded.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 52.

Specific Reporting Requirements:

Deviations from permit requirements (including emissions in excess of permit limits from startups, shutdowns, and malfunctions) shall be reported in accordance with Section F #6 of this permit.

401 KAR 59:190

The following is required in accordance with Section F #5 of this permit as part of compliance demonstration for Emission Limitation #1.

1. Minimum catalyst inlet temperature for each curing zone shall be reported for each 6 month period.
2. Maximum catalyst outlet temperature for each curing zone shall be reported for each 6 month period.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements (Continued):

401 KAR 59:190

3. Regenerated catalyst activity shall be reported for each curing zone if regeneration results are determined during the 6 month period.
4. All observations of insufficient capture for each application area shall be reported for the 6 month period (report none if all capture observations are adequate).
5. The maximum weight percentage of VOCs emitted shall be reported for each line during the 6 month period.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on pages 50 and 51.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on page 53.

Specific Control Equipment Operating Conditions:

Catalytic oxidation systems are contained inside of the enameling ovens. Refer to Operating Limitations #1 - #4 for control equipment operating conditions.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP12, EP13, EP14, EP15, EP16, and EP17 These emission points are Ultra Fine
(EE-02, EE-03, EE-04, EE-05, EE-06, and EE-07) Enameling Magnet Wire Machines.

Copper wire enters each of these machines, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the winding portion of the machine (depending on the number of coats desired and applied), and finally is wound for shipment.

Each machine consists of 4 lines or heads where only 1 wire (4 total wires) may make multiple passes through the head to produce insulated wire.

The machines are designed to apply, cure, and cool the wire on a plane that is roughly horizontal to the facility's floor.

Catalysts estimated to have a 98% VOC control efficiency are utilized in each curing zone to reduce emissions and generate heat for the process.

Electric heaters are utilized to generate any additional heat required in the curing zones.

An additional catalyst is utilized in the combined stack of the 4 heads to additionally reduce emissions.

EE-02 has a maximum throughput rate of 385 m/min for 0.07 mm diameter wire.

EE-03, EE-04, EE-05, EE-06, and EE-07 have a maximum throughput rate of 643 m/min for 0.07 mm diameter wire.

Wires with smaller diameters will have higher maximum throughput rates on all of these machines.

The 4 heads of each machine are exhausted to the ambient air through a single stack.

EE-02 construction commenced: projected in April 2000.

EE-03 construction commenced: projected in February 2001.

EE-04 construction commenced: projected in July 2001.

EE-05 and EE-06 construction commenced: projected in April 2002.

EE-07 construction commenced: projected in December 2002.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:190**, New insulation of magnet wire operations, applies to each affected facility part of a major source in a county designated attainment commenced on or after June 24, 1992.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:**401 KAR 59:190**

The following limits shall apply to assure compliance with Emission Limitation #1.

1. Each curing zone shall be operated such that the minimum inlet temperature to the catalyst is at least 626° F.
2. Each curing zone shall be operated such that the maximum outlet temperature from the catalyst is no more than 1200° F.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:190**

3. Each head shall be operated only if each of the catalysts used in the head has been operated less than 6,000 hours from initial installation, regeneration by a catalyst reactivation service vendor, or catalyst replacement.
4. Air flow near the applicators shall be into the curing zones.

Compliance Demonstration Method:

Initially this may be demonstrated quantitatively or qualitatively. Quantitative methods such as Method 204 will demonstrate compliance if less than 5% of the VOCs input are exhausted through temporary total enclosures surrounding the applicators. Qualitative demonstration is much more difficult to define but the degree of control is intended to be equivalent to a 5% or less loss.

Quantitative measurement of line capture can be accomplished by measuring the VOCs input at the applicator, building temporary total enclosures around the applicator portions of a head, assuming 100% of the VOC emissions exit through the curing zone stacks or the temporary total enclosures, and performing tests to determine VOC emissions from the curing zone stacks and the temporary total enclosures.

Qualitative demonstration can be accomplished if solvent odors are minimal around each machine and smoke from a smoke tube is drawn into the curing zones. Given the odor threshold of the solvents used in the coatings and the smoke observations, capture equivalent to a 5% loss will be assumed. However, care should be exercised when observing smoke being drawn into the curing zones. If possible, smoke should be puffed around the perimeter of the applicators or the openings in the enclosures surrounding the applicators (ignoring holes smaller than 10 in²), smoke should not linger for more than a few seconds, and nearly all of the smoke should enter the curing zones.

Subsequent demonstration is intended to be done by the following methods for each batch of wires ran on each head but an equivalent method approved by the division may be acceptable.

By measuring air velocity into the curing zones during initial demonstration, ongoing compliance can be accomplished through measurement of air velocity at the same locations as air velocity measurements during initial compliance. If all air velocities are $> 0.90 \times$ the initial air velocity measurements, capture can be demonstrated to be equivalent to the initial demonstration through documentation of the air velocity measurements for each batch of wires ran on each head. Alternatively, the qualitative initial demonstration above may be performed and documented for each batch of wires ran on each head.

401 KAR 59:010

The following limit shall apply to assure compliance with Emission Limitations #2 and #3.

5. Machines shall be operated and maintained consistent with good air pollution control practices.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):**

The following self-imposed **limit** shall apply **to preclude applicability of 40 CFR 63, Subpart B.**

6. S [(lbs of each coating input to each line at the above referenced machines x Individual HAP weight % of coating + lbs of each solvent input to each line at the above referenced machines x Individual HAP weight % of solvent)] - S [(lbs of each coating input to each line at the above referenced machines x Individual HAP weight % of coating + lbs of each solvent input to each line at the above referenced machines x Individual HAP weight % of solvent) x line capture of VOCs x line control device destruction efficiency] + Individual HAP content in cleaning solutions utilized for the above referenced machines during any consecutive 12 month period shall not exceed 18,000 lbs. (See the compliance demonstration for Emission Limitation #1 for clarification of terms in this limit.)

PSD VOC Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 49.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 52.

Emission Limitations:**401 KAR 59:190**

1. Section 3 limits VOC discharge into the atmosphere to a maximum of 15% by weight of the total VOCs input into each coating line or head (including mixing and cleanup).

Compliance Demonstration Method:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

Where:

$$\begin{aligned} \text{VOC input} = & S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)} \\ & + S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} = & \text{line capture of VOCs x line control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)}] \\ & + \text{cleaning room capture of VOCs x cleaning room control device destruction efficiency} \\ & \times S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method (Continued):**

Line capture of VOCs is either assumed to be 95% when Operating Limitation #4 is demonstrated qualitatively or as determined through quantitative measurements.

Line control device destruction efficiency has initially been assumed to be 98%. Once tested, initially assumed destruction efficiency shall be replaced by the results of the testing.

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested. And,

$$\begin{aligned} \text{Lbs of cleaning solution used for the line} &= \text{total lbs of cleaning solution used} \\ &\times [\text{S (lbs of coating input to the line} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to the line} \times \text{VOC weight \% of solvent)}] \\ &/ [\text{S (lbs of coating input to all lines} \times \text{VOC weight \% of coating)} \\ &+ \text{S (lbs of solvent input to all lines} \times \text{VOC weight \% of solvent)}]. \end{aligned}$$

401 KAR 59:010

2. Section 3(1) limits visible emissions from each stack to less than 20% opacity.
3. Section 3(2) limits emissions of particulate matter from each stack to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively. Otherwise, compliance with Operating Limitation #5 may be used to demonstrate compliance.

The following self-imposed **limits** shall apply **to preclude applicability of 40 CFR 63, Subpart B.**

4. Individual HAP emitted at the above referenced machines during any consecutive 12 month period shall not exceed 18,000 lbs.

Compliance Demonstration Method:

See Operating Limitation #6.

PSD VOC Synthetic Minor Limitation

See Section D, Emission Limitation #1 on pages 49 and 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Emission Limitation #1 on page 52.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Testing Requirements:****401 KAR 59:190**

The following requirements shall apply as part of compliance demonstration with Emission Limitation #1. Additionally, the testing shall also be performed at or near (within 10%) the normal operation maximum gas space velocity.

1. Catalytic destruction efficiency for one of the curing zones shall be demonstrated through stack testing prior to regeneration and shall be within 300 operating hours of the scheduled regeneration unless testing is performed as described for EE-01. If control efficiency is determined at the stack level, input from all four heads shall be utilized to confirm that the combined stack catalyst is capable of functioning at a relatively high VOC throughput rate.
2. Testing described in Testing Requirement #1 shall be repeated within 3 years. Alternatively, testing shall be repeated within 5 years if the following conditions are satisfied:
 - a. Regenerated catalyst activity meets or exceeds the reported activity stack tested previously;
 - b. Stack testing has always indicated that compliance demonstration with Emission Limitation #1 was achieved at the relevant activity levels; and
 - c. The permittee notifies the division that such is the case 90 days prior to the 3 year anniversary of the most recent test.
3. If any of the catalytic destruction efficiency testing described in Testing Requirements #1 and #2 fails to demonstrate 90% destruction efficiency, a quantitative measurement of capture efficiency shall be performed as described in the compliance demonstration for Operating Limitation #4 to demonstrate compliance with Emission Limitation #1.

Note: Results will not include emissions from mixing or emissions that result after the curing zones, however, these emission sources are believed to be negligible.

Specific Monitoring Requirements:**401 KAR 59:190**

The following is required as part of compliance demonstration for Operating Limitations #1 through #4.

1. Inlet temperature to the each catalyst shall be monitored continuously when in operation.
2. Outlet temperature from each catalyst shall be monitored continuously when in operation.
3. Hours of operation for each line shall be monitored daily.
4. Monitoring described in the compliance demonstration method for Operating Limitation #4 shall be performed for each batch of wires ran on each head.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Record Keeping Requirements:

401 KAR 59:190

The following is required in accordance with Section F #2 of this permit by Section 4(8) of 401 KAR 59:190 or as part of compliance demonstration for Operating Limitations #1 through #4 and Emission Limitation #1.

1. Inlet temperature to each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time, inlet temperature to each catalyst shall be recorded during the time the batch is processed [see 401 KAR 59:190 Section 4(8)(g) for regulation citation].
2. Outlet temperature from each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time, outlet temperature from each catalyst shall be recorded during the time the batch is processed [see 401 KAR 59:190 Section 4(8)(g) for regulation citation].
3. Hours of operation prior to catalyst regeneration shall be recorded for each line.
4. All observations resulting from Specific Monitoring Requirement #4 shall be recorded and include a description of the monitoring, equipment used, location relative to the applicators of measurements or smoke, and any qualitative or quantitative measurements taken.
5. All results of Testing Requirements shall be recorded.
6. The regenerated catalyst activity of each curing zone shall be noted using reported performance characteristics furnished by the reactivation service vendor and tracked through serial numbers or other definitive means.

Requirements #7 - #11 shall be recorded daily unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA but even if a SIP revision is approved, the frequency must not exceed 30 days.

7. Daily records shall record the applicable administrative regulation number, application method, and substrate type [see 401 KAR 59:190 Sections 4(8)(a) and (b) for regulation citation].
8. The amount and type of coating or solvent (including exempt compounds) used at each point of application shall be recorded [see 401 KAR 59:190 Section 4(8)(c) for regulation citation]. (This condition is also required for compliance demonstration with self-imposed **limits to preclude applicability of 40 CFR 63, Subpart B.**)
9. The VOC content of each coating or solvent shall be recorded [see 401 KAR 59:190 Section 4(8)(d) for regulation citation].
10. The date each coating or solvent is applied shall be recorded [see 401 KAR 59:190 Section 4(8)(e) for regulation citation].
11. The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each shall be recorded [see 401 KAR 59:190 Section 4(8)(f) for regulation citation].
12. The lbs of cleaning solution used for each line shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA. (This condition is also required for compliance demonstration with self-imposed **limits to preclude applicability of 40 CFR 63, Subpart B.**)

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Record Keeping Requirements (Continued):****401 KAR 59:190**

13. The weight percentage of VOCs emitted shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #2 and #3.

14. All maintenance on the above referenced machines shall be recorded.

Self-imposed **limits to preclude applicability of 40 CFR 63, Subpart B** require the following record keeping.

15. The individual HAP and combined HAPs content of each coating, solvent, and cleaning solution shall be recorded.
16. The amount of each individual HAP emitted each month as determined using the method of calculation in Operating Limitation #6 shall be recorded.
17. The total individual HAP emissions for any 12 consecutive month period shall be recorded (total from startup to the relevant month if operated less than 12 months).

PSD VOC Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 52.

Specific Reporting Requirements:

Deviations from permit requirements (including emissions in excess of permit limits from startups, shutdowns, and malfunctions) shall be reported in accordance with Section F #6 of this permit.

401 KAR 59:190

The following is required in accordance with Section F #5 of this permit as part of compliance demonstration for Emission Limitation #1.

1. Minimum catalyst inlet temperature for each curing zone shall be reported for each 6 month period.
2. Maximum catalyst outlet temperature for each curing zone shall be reported for each 6 month period.
3. Regenerated catalyst activity shall be reported for each curing zone if regeneration results are determined during the 6 month period.
4. All observations of insufficient capture for each application area shall be reported for the 6 month period (report none if all capture observations are adequate).
5. The maximum weight percentage of VOCs emitted shall be reported for each line during the 6 month period.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Reporting Requirements (Continued):

Self-imposed **limits to preclude applicability of 40 CFR 63 Subpart B** require the following to be reported.

- 6.** The amount of each individual HAP emitted (in lbs or tons) for each month in the 6 month period shall be reported.
- 7.** The cumulative amount of each individual HAP emitted (in lbs or tons) for each 12 consecutive month period concluded in the 6 month period shall be reported. If the units have not been operated for 12 months, note the total of each individual HAP up to the end of each month and the number of months from initial startup of the first operating unit.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on pages 50 and 51.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on page 53.

Specific Control Equipment Operating Conditions:

Catalytic oxidation systems are contained inside of the enameling ovens. Refer to Operating Limitations #1 - #4 for control equipment operating conditions.

Alternate Operating Scenarios:

N/A

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

EP11 (EE-01) This emission point is an Ultra Fine Enameling Magnet Wire Machine.

Copper wire enters the machine, is drawn through an applicator and dies so that insulation is applied, passes through a curing zone and a cooling zone (in this order), either returns to the applicator or continues to the winding portion of the machine (depending on the number of coats desired and applied), and finally is wound for shipment.

EE-01 consists of 2 lines or heads where only 1 wire (2 total wires) may make multiple passes through the head to produce insulated wire.

The machine is designed to apply, cure, and cool the wire on a plane that is roughly horizontal to the facility's floor.

Catalysts estimated to have a 98% VOC control efficiency are utilized in each curing zone to reduce emissions and generate heat for the process.

Electric heaters are utilized to generate any additional heat required in the curing zones.

EE-01 utilizes catalysts only in the curing zones (there is no additional catalyst as with the other ultra fine enameling machines).

EE-01 has a maximum throughput rate of 229 m/min for 0.07 mm diameter wire.

Wires with smaller diameters will have higher maximum throughput rates on all of these machines.

The heads of the machine are exhausted to the ambient air through a single stack.

EE-01 construction commenced: November 1995.

APPLICABLE REGULATIONS:

Regulation **401 KAR 59:190**, New insulation of magnet wire operations, applies to each affected facility part of a major source in a county designated attainment commenced on or after June 24, 1992.

Regulation **401 KAR 59:010**, New process operations applicable to each affected facility associated with a process operation which is not subject to another emission standard with respect to particulates in Chapter 59 of 401 KAR commenced on or after July 2, 1975.

Operating Limitations:**401 KAR 59:190**

The following limits shall apply to assure compliance with Emission Limitation #1.

1. Each curing zone shall be operated such that the minimum inlet temperature to the catalyst is at least 626° F.
2. Each curing zone shall be operated such that the maximum outlet temperature from the catalyst is no more than 1200° F.
3. Each head shall be operated only if each of the catalysts used in the head has been operated less than 6,000 hours from initial installation, regeneration by a catalyst reactivation service vendor, or catalyst replacement.
4. Air flow near the applicators shall be into the curing zones.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Operating Limitations (Continued):****401 KAR 59:190****Compliance Demonstration Method:**

Initially this may be demonstrated quantitatively or qualitatively. Quantitative methods such as Method 204 will demonstrate compliance if less than 5% of the VOCs input are exhausted through temporary total enclosures surrounding the applicators. Qualitative demonstration is much more difficult to define but the degree of control is intended to be equivalent to a 5% or less loss.

Quantitative measurement of line capture can be accomplished by measuring the VOCs input at the applicator, building temporary total enclosures around the applicator portions of a head, assuming 100% of the VOC emissions exit through the curing zone stacks or the temporary total enclosures, and performing tests to determine VOC emissions from the curing zone stacks and the temporary total enclosures.

Qualitative demonstration can be accomplished if solvent odors are minimal around each machine and smoke from a smoke tube is drawn into the curing zones. Given the odor threshold of the solvents used in the coatings and the smoke observations, capture equivalent to a 5% loss will be assumed. However, care should be exercised when observing smoke being drawn into the curing zones. If possible, smoke should be puffed around the perimeter of the applicators or the openings in the enclosures surrounding the applicators (ignoring holes smaller than 10 in²), smoke should not linger for more than a few seconds, and nearly all of the smoke should enter the curing zones.

Subsequent demonstration is intended to be done by the following methods for each batch of wires ran on each head but an equivalent method approved by the division may be acceptable.

By measuring air velocity into the curing zones during initial demonstration, ongoing compliance can be accomplished through measurement of air velocity at the same locations as air velocity measurements during initial compliance. If all air velocities are $> 0.90 \times$ the initial air velocity measurements, capture can be demonstrated to be equivalent to the initial demonstration through documentation of the air velocity measurements for each batch of wires ran on each head. Alternatively, the qualitative initial demonstration above may be performed and documented for each batch of wires ran on each head.

401 KAR 59:010

The following limit shall apply to assure compliance with Emission Limitations #2 and #3.

5. Machines shall be operated and maintained consistent with good air pollution control practices.

PSD VOC Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 49.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Operating Limitation #1 on page 52.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations:****401 KAR 59:190**

1. Section 3 limits VOC discharge into the atmosphere to a maximum of 15% by weight of the total VOCs input into each coating line or head (including mixing and cleanup).

Compliance Demonstration Method:

Total VOCs input into each line over a 24-hour period (unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA) shall be controlled so that no more than 15% by weight is emitted into the atmosphere. Use the following equations to demonstrate weight percent of VOCs emitted.

$$\text{Weight percentage of VOCs emitted} = \text{VOC emitted} / \text{VOC input}$$

Where:

$$\begin{aligned} \text{VOC input} = & S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)} \\ & + S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

$$\begin{aligned} \text{VOC emitted} = & \text{line capture of VOCs x line control device destruction efficiency} \\ & \times [S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)}] \\ & + \text{cleaning room capture of VOCs x cleaning room control device destruction efficiency} \\ & \times S \text{ (lbs of cleaning solution used for the line x VOC weight \% of cleaning solution)} \end{aligned}$$

Line capture of VOCs is either assumed to be 95% when Operating Limitation #4 is demonstrated qualitatively or as determined through quantitative measurements.

Line control device destruction efficiency has initially been assumed to be 98%. Once tested, initially assumed destruction efficiency shall be replaced by the results of the testing.

Cleaning room capture of VOCs has been assumed to be 100%.

Cleaning room control device destruction efficiency is assumed to be 0.0% unless tested.

And,

$$\begin{aligned} \text{Lbs of cleaning solution used for the line} = & \text{total lbs of cleaning solution used} \\ & \times [S \text{ (lbs of coating input to the line x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to the line x VOC weight \% of solvent)}] \\ & / [S \text{ (lbs of coating input to all lines x VOC weight \% of coating)} \\ & + S \text{ (lbs of solvent input to all lines x VOC weight \% of solvent)}]. \end{aligned}$$

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Emission Limitations (Continued):****401 KAR 59:010**

2. Section 3(1) limits visible emissions from each stack to less than 20% opacity.
3. Section 3(2) limits emissions of particulate matter from each stack to a maximum of 2.34 lbs/hr.

Compliance Demonstration Method:

If deemed necessary, the Cabinet shall require testing in accordance with 40 CFR 60 Appendix A, Methods 9 and 5, respectively. Otherwise, compliance with Operating Limitation #5 may be used to demonstrate compliance.

PSD VOC Synthetic Minor Limitation

See Section D, Emission Limitation #1 on pages 49 and 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Emission Limitation #1 on page 52.

Testing Requirements:**401 KAR 59:190**

The following requirements shall apply as part of compliance demonstration with Emission Limitation #1. Additionally, the testing shall also be performed at or near (within 10%) the normal operation maximum gas space velocity.

1. Catalytic destruction efficiency for one of the curing zones shall be demonstrated through stack testing prior to regeneration and shall be within 300 operating hours of the scheduled regeneration unless one of the other EE machines is tested to determine control efficiency prior to the combined stack catalyst.
2. Testing described in Testing Requirement #1 shall be repeated within 3 years unless the destruction efficiency data is obtained from one of the other EE machines, as described in Testing Requirement #1. Alternatively, testing shall be repeated within 5 years if the following conditions are satisfied:
 - a. Regenerated catalyst activity meets or exceeds the reported activity stack tested previously;
 - b. Stack testing has always indicated that compliance demonstration with Emission Limitation #1 was achieved at the relevant activity levels; and
 - c. The permittee notifies the division that such is the case 90 days prior to the 3 year anniversary of the most recent test.
3. If any of the catalytic destruction efficiency testing described in Testing Requirements #1 and #2 fails to demonstrate 90% destruction efficiency, a quantitative measurement of capture efficiency shall be performed as described in the compliance demonstration for Operating Limitation #4 to demonstrate compliance with Emission Limitation #1.

Note: Results will not include emissions from mixing or emissions that result after the curing zones, however, these emission sources are believed to be negligible.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Monitoring Requirements:****401 KAR 59:190**

The following is required as part of compliance demonstration for Operating Limitations #1 through #4.

1. Inlet temperature to the each catalyst shall be monitored continuously when in operation.
2. Outlet temperature from each catalyst shall be monitored continuously when in operation.
3. Hours of operation for each line shall be monitored daily.
4. Monitoring described in the compliance demonstration method for Operating Limitation #4 shall be performed for each batch of wires ran on each head.

Specific Record Keeping Requirements:**401 KAR 59:190**

The following is required in accordance with Section F #2 of this permit by Section 4(8) of 401 KAR 59:190 or as part of compliance demonstration for Operating Limitations #1 through #4 and Emission Limitation #1.

1. Inlet temperature to each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time, inlet temperature to each catalyst shall be recorded during the time the batch is processed [see 401 KAR 59:190 Section 4(8)(g) for regulation citation].
2. Outlet temperature from each catalyst shall be recorded at least once per 8-hour shift and if a batch of wires is ran in a shorter period of time, outlet temperature from each catalyst shall be recorded during the time the batch is processed [see 401 KAR 59:190 Section 4(8)(g) for regulation citation].
3. Hours of operation prior to catalyst regeneration shall be recorded for each line.
4. All observations resulting from Specific Monitoring Requirement #4 shall be recorded and include a description of the monitoring, equipment used, location relative to the applicators of measurements or smoke, and any qualitative or quantitative measurements taken.
5. All results of Testing Requirements shall be recorded.
6. The regenerated catalyst activity of each curing zone shall be noted using reported performance characteristics furnished by the reactivation service vendor and tracked through serial numbers or other definitive means.

Requirements #7 - #11 shall be recorded daily unless a SIP revision is approved by the cabinet and authorized by the U.S. EPA but even if a SIP revision is approved, the frequency must not exceed 30 days.

7. Daily records shall record the applicable administrative regulation number, application method, and substrate type [see 401 KAR 59:190 Sections 4(8)(a) and (b) for regulation citation].
8. The amount and type of coating or solvent (including exempt compounds) used at each point of application shall be recorded [see 401 KAR 59:190 Section 4(8)(c) for regulation citation].

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)**Specific Record Keeping Requirements (Continued):****401 KAR 59:190**

9. The VOC content of each coating or solvent shall be recorded [see 401 KAR 59:190 Section 4(8)(d) for regulation citation].
10. The date each coating or solvent is applied shall be recorded [see 401 KAR 59:190 Section 4(8)(e) for regulation citation].
11. The amount of surface preparation, cleanup, or washup solvent (including exempt compounds) used and the VOC content of each shall be recorded [see 401 KAR 59:190 Section 4(8)(f) for regulation citation].
12. The lbs of cleaning solution used for each line shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.
13. The weight percentage of VOCs emitted shall be calculated and recorded for each day unless monthly recording is approved by the cabinet and authorized by the U.S. EPA.

401 KAR 59:010

The following is required as part of compliance demonstration for Emission Limitations #2 and #3.

14. All maintenance on the above referenced machines shall be recorded.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 50.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Record Keeping Requirements on page 52.

Specific Reporting Requirements:

Deviations from permit requirements (including emissions in excess of permit limits from startups, shutdowns, and malfunctions) shall be reported in accordance with Section F #6 of this permit. The following is required in accordance with Section F #5 of this permit as part of compliance demonstration for Emission Limitation #1.

1. Minimum catalyst inlet temperature for each curing zone shall be reported for each 6 month period.
2. Maximum catalyst outlet temperature for each curing zone shall be reported for each 6 month period.
3. Regenerated catalyst activity shall be reported for each curing zone if regeneration results are determined during the 6 month period.
4. All observations of insufficient capture for each application area shall be reported for the 6 month period (report none if all capture observations are adequate).
5. The maximum weight percentage of VOCs emitted shall be reported for each line during the 6 month period.

PSD VOC Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on pages 50 and 51.

PSD Particulate Matter Synthetic Minor Limitation

See Section D, Specific Reporting Requirements on page 53.

SECTION B - EMISSION POINTS, EMISSIONS UNITS, APPLICABLE REGULATIONS, AND OPERATING CONDITIONS (CONTINUED)

Specific Control Equipment Operating Conditions:

Catalytic oxidation systems are contained inside of the enameling ovens. Refer to Operating Limitations #1 - #4 for control equipment operating conditions.

Alternate Operating Scenarios:

N/A

SECTION C - INSIGNIFICANT ACTIVITIES

The following listed activities have been determined to be insignificant activities for this source pursuant to Regulation 401 KAR 50:035, Section 5(4). While these activities are designated as insignificant the permittee must comply with the applicable regulation and some minimal level of periodic monitoring may be necessary.

<u>Description</u>	<u>Generally Applicable Regulation</u>
1. Wire drawing prior to enameling	None

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS

Testing Requirements for EV-01, EV-02, EV-03, and EV-04:

401 KAR 59:190

The following testing shall apply as part of compliance demonstration with limits in Section B and shall be completed by methods referenced in 401 KAR 50:015, Section 1 or 40 CFR. These testing requirements have been included in Section D because of the similarity in the machines. The following requirements are necessary to periodically verify control device destruction efficiency.

1. Prior to August 11, 2001, catalytic VOC destruction efficiency for one of the curing zones shall be demonstrated through stack testing prior to regeneration and shall be within 300 operating hours of the scheduled regeneration. The testing shall be performed on the catalyst with the lowest activity level (as identified through catalyst reactivation service vendor reports). And, the testing shall also be performed at or near (within 10%) the normal operation maximum gas space velocity.
2. Testing described in Testing Requirement #1 shall be repeated within 3 years. Alternatively, testing shall be repeated within 5 years if the following conditions are satisfied:
 - a. Regenerated catalyst activity meets or exceeds the reported activity stack tested previously;
 - b. Stack testing has always indicated that compliance demonstration with Emission Limitation #1 was achieved at the relevant activity levels; and
 - c. The permittee notifies the division that such is the case 90 days prior to the 3 year anniversary of the most recent test.
3. If any of the catalytic destruction efficiency testing described in Testing Requirements #1 and #2 fails to demonstrate 90% destruction efficiency, a quantitative measurement of capture efficiency shall be performed as described in the compliance demonstration for Operating Limitation #4 to demonstrate compliance with Emission Limitation #1.

Note: Results will not include emissions from mixing or emissions that result after the curing zones, however, these emission sources are believed to be negligible.

The following testing shall be performed to demonstrate that the source is not a PSD major source of CO.

4. Within 18 months of issuance of this permit testing shall be performed at or near (within 10%) the normal operation maximum temperature to determine CO emissions compared to resin input to an oven.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Testing Requirements for EH-01, EH-02, EH-03, EH-04, and EH-05:

401 KAR 59:190

The following testing shall apply as part of compliance demonstration with limits in Section B and shall be completed by methods referenced in 401 KAR 50:015, Section 1 or 40 CFR. These testing requirements have been included in Section D because of the similarity in the machines. The following requirements are necessary to periodically verify control device destruction efficiency.

1. Prior to August 11, 2001, catalytic VOC destruction efficiency for one of the curing zones shall be demonstrated through stack testing prior to regeneration and shall be within 300 operating hours of the scheduled regeneration. The testing shall be performed on the catalyst with the lowest activity level (as identified through catalyst reactivation service vendor reports). And, the testing shall also be performed at or near (within 10%) the normal operation maximum gas space velocity.
2. Testing described in Testing Requirement #1 shall be repeated within 3 years. Alternatively, testing shall be repeated within 5 years if the following conditions are satisfied:
 - a. Regenerated catalyst activity meets or exceeds the reported activity stack tested previously;
 - b. Stack testing has always indicated that compliance demonstration with Emission Limitation #1 was achieved at the relevant activity levels; and
 - c. The permittee notifies the division that such is the case 90 days prior to the 3 year anniversary of the most recent test.
3. If any of the catalytic destruction efficiency testing described in Testing Requirements #1 and #2 fails to demonstrate 90% destruction efficiency, a quantitative measurement of capture efficiency shall be performed as described in the compliance demonstration for Operating Limitation #4 to demonstrate compliance with Emission Limitation #1.

Note: Results will not include emissions from mixing or emissions that result after the curing zones, however, these emission sources are believed to be negligible.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)**Source Wide VOC Limitations**

PSD Synthetic Minor Limits have voluntarily been accepted to avoid applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, requirements. Exceedance of the major source emission level, as defined in 401 KAR 51:017 will trigger additional requirements and regulations.

Operating Limitations:**Source Wide VOC Synthetic Minor Limitation**

1. $S [(lbs \text{ of each coating input to each line} \times VOC \text{ weight } \% \text{ of coating} + lbs \text{ of each solvent input to each line} \times VOC \text{ weight } \% \text{ of solvent})] - S [(lbs \text{ of each coating input to each line} \times VOC \text{ weight } \% \text{ of coating} + lbs \text{ of each solvent input to each line} \times VOC \text{ weight } \% \text{ of solvent}) \times \text{line capture of VOCs} \times \text{line control device VOC destruction efficiency}] + S (lbs \text{ of each cleaning solution used} \times VOC \text{ weight } \% \text{ of cleaning solution})$ during any consecutive 12 month period **shall be < or = to 450,000 lbs / 12 consecutive month period (demonstrated monthly)**. (See the compliance demonstration for Emission Limitation #1 for clarification of terms in this limit.)

Emission Limitations:**Source Wide VOC Synthetic Minor Limitation**

1. For any 12 consecutive month period, source wide VOC emissions shall be less than or equal to 225 tons as demonstrated on a monthly basis.

Compliance Demonstration Method:

See Operating Limitation #1 above. Use of test results, material balances, and division approved capture efficiency estimates will be required. The following shall be used during compliance demonstration with Operating Limitation #1 unless the division approves an alternative.

VOC weight % of coating	=	Determined using Method 24 from 40 CFR 60 or Certified MSDS
VOC weight % of solvent	=	Determined using Method 24 from 40 CFR 60 or Certified MSDS
Line capture of VOCs	=	If determined using qualitative method use 0.95, otherwise use results of quantitative measurements
Line control device VOC destruction efficiency	=	Determined from the most recent stack test results and manufacturer estimate if the machine type hasn't been tested (at the time of permit issuance the EV machines will use 0.938, the EH machines with base coat and top coat sections will use 0.998 and 0.993, respectively, the other EH machines will use 0.993, EE-01 will use 0.98 until testing relevant to EE-01 described in Section B is performed, and the other EE machines will use 0.98 until tested)

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Emission Limitations (Continued):

Source Wide VOC Synthetic Minor Limitation

Compliance Demonstration Method (Continued):

VOC weight % of cleaning solution = Determined using Method 24 from 40 CFR 60 or Certified MSDS

Testing Requirements:

No additional testing requirements result from the Source Wide VOC Synthetic Minor Limitations.

Specific Record Keeping Requirements:

Source Wide VOC Synthetic Minor Limitations require the following to be recorded. Some of these record keeping requirements may be identical to other record keeping requirements elsewhere in this permit. This has been done to make requirements and calculations clearer. Repeated record keeping requirements do not require repeated data documentation.

1. Pounds of each coating used at each line each month.
2. Pounds of each solvent used at each line each month.
3. The VOC weight % of each coating and solvent used.
4. Pounds of each cleaning solution used at the source each month.
5. The VOC weight % of each cleaning solution used.
6. All emission test results relevant to demonstration of compliance with Operating Limitation #1.
7. The amount of VOC emitted from each line each month (as calculated using the formula in Operating Limitation #1).
8. The total amount of VOC emitted from the source each 12 consecutive month period for which data is available.

Specific Reporting Requirements:

Source Wide VOC Synthetic Minor Limitations require the following to be reported semi-annually. These reports shall be certified by a responsible official, and delivered by electronic media (such as fax or e-mail) or postmarked to the Division's Bowling Green Regional Office within thirty days following the six-month anniversary date of this permit unless the permittee requests and receives written approval from the Bowling Green Regional Office to report on January 30th and July 30th of each year. These reports may also be delivered by courier as long as the reports are stamped received as indicated above. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

1. Any deviations from the above synthetic minor requirements and limitations.
2. Total VOC applied at each line each month.
3. The capture efficiency and VOC destruction efficiency used in emission calculations for each line.
4. Total VOC emitted from each line each month.
5. Total cleaning solution VOC used at the source each month.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Specific Reporting Requirements (Continued):

Source Wide VOC Synthetic Minor Limitation

- 6.** Total VOC emitted from the source each month in the reporting period.
- 7.** Total VOC emitted from the source each 12 consecutive month period ending in the reporting period. If 12 consecutive months have not passed since issuance of this permit, the total VOC emitted up to the relevant months ending in the reporting period shall be totaled and reported with a notation of the time period being reported.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)

Source Wide Particulate Matter Limitations

PSD Synthetic Minor Limits have voluntarily been accepted to avoid applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality, requirements. Exceedance of the major source emission level, as defined in 401 KAR 51:017 will trigger additional requirements and regulations.

Operating Limitations:

Source Wide Particulate Matter Synthetic Minor Limitation

1. S [(lbs of each coating input to the lines x resin weight % of coating) x (weight % volatilized) during any consecutive 12 month period **shall be < or = to** 450,000 lbs / 12 consecutive month period (demonstrated monthly). (See the compliance demonstration for Emission Limitation #1 for clarification of terms in this limit.)

Emission Limitations:

Source Wide Particulate Matter Synthetic Minor Limitation

1. For any 12 consecutive month period, source wide particulate matter emissions shall be less than or equal to 225 tons as demonstrated on a monthly basis.

Compliance Demonstration Method:

See Operating Limitation #1 above. Use of material balances and EPA estimate will be required unless testing is utilized. The following shall be used during compliance demonstration with Operating Limitation #1 unless the division approves an alternative.

Resin weight % of coating = Determined using Method 24 from 40 CFR 60 or Certified MSDS

Weight % volatilized = 25% (based on EPA estimate) or as determined through testing

Testing Requirements:

Testing shall be conducted if required by the cabinet in accordance with Regulation 401 KAR 50:045 Section 4.

Specific Record Keeping Requirements:

Source Wide Particulate Matter Synthetic Minor Limitations require the following to be recorded. Some of these record keeping requirements may be identical to other record keeping requirements elsewhere in this permit. This has been done to make requirements and calculations clearer. Repeated record keeping requirements do not require repeated data documentation.

1. Pounds of each coating used in the lines each month.
2. The resin weight % of each coating.
3. Any emission test results relevant to demonstration of compliance with Operating Limitation #1.
4. The amount of particulate matter emitted from the source each month (as calculated using the formula in Operating Limitation #1).
5. The total amount of VOC emitted from the source each 12 consecutive month period for which data is available.

SECTION D - SOURCE EMISSION LIMITATIONS AND TESTING REQUIREMENTS (CONTINUED)**Specific Reporting Requirements:**

Source Wide Particulate Matter Synthetic Minor Limitations require the following to be reported semi-annually. These reports shall be certified by a responsible official, and delivered by electronic media (such as fax or e-mail) or postmarked to the Division's Bowling Green Regional Office within thirty days following the six-month anniversary date of this permit unless the permittee requests and receives written approval from the Bowling Green Regional Office to report on January 30th and July 30th of each year. These reports may also be delivered by courier as long as the reports are stamped received as indicated above. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.

1. Any deviations from the above synthetic minor requirements and limitations.
2. Total resin applied at the source each month.
3. Total particulate matter emitted from the source each month.
4. Total particulate matter emitted from the source each 12 consecutive month period ending in the reporting period. If 12 consecutive months have not passed since issuance of this permit, the total particulate matter emitted up to the relevant months ending in the reporting period shall be totaled and reported with a notation of the time period being reported.

SECTION E - SOURCE CONTROL EQUIPMENT REQUIREMENTS

1. Pursuant to 401 KAR 50:055, Section 2(5), at all times, including periods of startup, shutdown and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the division which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS

1. When continuing compliance is demonstrated by periodic testing or instrumental monitoring, the permittee shall compile records of required monitoring information that include:
 - a. Date, place as defined in this permit, and time of sampling or measurements.
 - b. Analyses performance dates;
 - c. Company or entity that performed analyses;
 - d. Analytical techniques or methods used;
 - e. Analyses results; and
 - f. Operating conditions during time of sampling or measurement.
2. Records of all required monitoring data and support information, including calibrations, maintenance records, and original strip chart recordings, and copies of all reports required by the Division for Air Quality, shall be retained by the permittee for a period of five years and shall be made available for inspection upon request by any duly authorized representative of the Division for Air Quality. [401 KAR 50:035, Permits, Section 7(1)(d)2 and 401 KAR 50:035, Permits, Section 7(2)(c)]
3. In accordance with the requirements of Regulation 401 KAR 50:035, Permits, Section 7(2)(c) the permittee shall allow the Cabinet or authorized representatives to perform the following:
 - a. Enter upon the premises where a source is located or emissions-related activity is conducted, or where records are kept;
 - b. Have access to and copy, at reasonable times, any records required by the permit:
 - i. During normal office hours, and
 - ii. During periods of emergency when prompt access to records is essential to proper assessment by the Cabinet;
 - c. Inspect, at reasonable times, any facilities, equipment (including monitoring and pollution control equipment), practices, or operations required by the permit. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency; and
 - d. Sample or monitor, at reasonable times, substances or parameters to assure compliance with the permit or any applicable requirements. Reasonable times shall include, but are not limited to the following:
 - i. During all hours of operation at the source,
 - ii. For all sources operated intermittently, during all hours of operation at the source and the hours between 8:00 a.m. and 4:30 p.m., Monday through Friday, excluding holidays, and
 - iii. During an emergency.
4. No person shall obstruct, hamper, or interfere with any Cabinet employee or authorized representative while in the process of carrying out official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

5. Reports of any monitoring required by this permit shall be reported to the division's Bowling Green Regional Office no later than the six-month anniversary date of this permit and every six months thereafter during the life of this permit, unless otherwise stated in this permit. The permittee may shift to semi-annual reporting on a calendar year basis upon approval of the regional office. If calendar year reporting is approved, the semi-annual reports are due January 30th and July 30th of each year. All reports shall be certified by a responsible official pursuant to Section 6(1) of Regulation 401 KAR 50:035, Permits. All deviations from permit requirements shall be clearly identified in the reports.
6.
 - a. In accordance with the provisions of Regulation 401 KAR 50:055, Section 1 the owner or operator shall notify the Division for Air Quality's Bowling Green Regional Office concerning startups, shutdowns, or malfunctions as follows:
 1. When emissions during any planned shutdowns and ensuing startups will exceed the standards notification shall be made no later than three (3) days before the planned shutdown, or immediately following the decision to shut down, if the shutdown is due to events which could not have been foreseen three (3) days before the shutdown.
 2. When emissions due to malfunctions, unplanned shutdowns and ensuing startups are or may be in excess of the standards notification shall be made as promptly as possible by telephone (or other electronic media) and shall cause written notice upon request.
 - b. In accordance with the provisions of Regulation 401 KAR 50:035, Section 7(1)(e)2, the owner or operator shall report emission related exceedances from permit requirements including those attributed to upset conditions (other than emission exceedances covered by Section F Item 6a. above) to the Division for Air Quality's Bowling Green Regional Office within 30 days. Other deviations from permit requirements shall be included in the semiannual report required by Section F Item 5.

SECTION F - MONITORING, RECORD KEEPING, AND REPORTING REQUIREMENTS (CONTINUED)

7. Pursuant to Regulation 401 KAR 50:035, Permits, Section 7(2)(b), the permittee shall certify compliance with the terms and conditions contained in this permit, annually on the permit issuance anniversary date or by January 30th of each year if calendar year reporting is approved by the regional office, by completing and returning a Compliance Certification Form (DEP 7007CC) (or an approved alternative) to the Division for Air Quality's Bowling Green Regional Office and the U.S. EPA in accordance with the following requirements:
- Identification of each term or condition of the permit that is the basis of the certification;
 - The compliance status regarding each term or condition of the permit;
 - Whether compliance was continuous or intermittent; and
 - The method used for determining the compliance status for the source, currently and over the reporting period, pursuant to 401 KAR 50:035, Section 7(1)(c),(d), and (e).
 - The certification shall be postmarked by the thirtieth (30) day following the applicable permit issuance anniversary date, or by January 30th of each year if calendar year reporting is approved by the regional office. **Annual compliance certifications should be mailed to the following addresses:**

**Division for Air Quality
Bowling Green Regional Office
1508 Westen Avenue
Bowling Green, KY 42104**

**U.S. EPA Region IV
Air Enforcement Branch
Atlanta Federal Center
61 Forsyth St.
Atlanta, GA 30303-8960**

**Division for Air Quality
Central Files
803 Schenkel Lane
Frankfort, KY 40601**

8. In accordance with Regulation 401 KAR 50:035, Section 23, the permittee shall provide the division with all information necessary to determine its subject emissions within thirty (30) days of the date the KEIS emission report is mailed to the permittee.
9. Pursuant to Section VII.3 of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1(1), results of performance test(s) required by the permit shall be submitted to the division by the source or its representative within forty-five days after the completion of the fieldwork.

SECTION G - GENERAL CONDITIONS**(a) General Compliance Requirements**

1. The permittee shall comply with all conditions of this permit. A noncompliance shall be (a) violation(s) of state regulation 401 KAR 50:035, Permits, Section 7(3)(d) and is also a violation of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) and is grounds for enforcement action including but not limited to the termination, revocation and reissuance, or revision of this permit.
2. The filing of a request by the permittee for any permit revision, revocation, reissuance, or termination, or of a notification of a planned change or anticipated noncompliance, shall not stay any permit condition.
3. This permit may be revised, revoked, reopened and reissued, or terminated for cause. The permit will be reopened for cause and revised accordingly under the following circumstances:
 - a. If additional applicable requirements become applicable to the source and the remaining permit term is three (3) years or longer. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if compliance with the applicable requirement is not required until after the date on which the permit is due to expire, unless this permit or any of its terms and conditions have been extended pursuant to Regulation 401 KAR 50:035, Section 12(2)(c);
 - b. The Cabinet or the U. S. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements;
 - c. The Cabinet or the U. S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable. Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the division, at least thirty (30) days in advance of the date the permit is to be reopened, except that the division may provide a shorter time period in the case of an emergency.

4. The permittee shall furnish to the division, in writing, information that the division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. [401 KAR 50:035, Permits, Section 7(2)(b)3e and 401 KAR 50:035, Permits, Section 7(3)(j)]
5. The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the permitting authority.

SECTION G - GENERAL CONDITIONS (CONTINUED)

6. Any condition or portion of this permit which becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this permit. [401 KAR 50:035, Permits, Section 7(3)(k)]
7. The permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance. [401 KAR 50:035, Permits, Section 7(3)(e)]
8. Except as identified as state-origin requirements in this permit, all terms and conditions contained herein shall be enforceable by the United States Environmental Protection Agency and citizens of the United States.
9. This permit shall be subject to suspension if the permittee fails to pay all emissions fees within 90 days after the date of notice as specified in 401 KAR 50:038, Section 3(6). [401 KAR 50:035, Permits, Section 7(3)(h)]
10. Nothing in this permit shall alter or affect the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [401 KAR 50:035, Permits, Section 8(3)(b)]
11. This permit shall not convey property rights or exclusive privileges. [401 KAR 50:035, Permits, Section 7 (3)(g)]
12. Issuance of this permit does not relieve the permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Kentucky Cabinet for Natural Resources and Environmental Protection or any other federal, state, or local agency.
13. Nothing in this permit shall alter or affect the authority of U.S. EPA to obtain information pursuant to Federal Statute 42 USC 7414, Inspections, monitoring, and entry. [401 KAR 50:035, Permits, Section 7(2)(b)5]
14. Nothing in this permit shall alter or affect the authority of U.S. EPA to impose emergency orders pursuant to Federal Statute 42 USC 7603, Emergency orders. [401 KAR 50:035, Permits, Section 8(3)(a)]
15. Permit Shield: Except as provided in State Regulation 401 KAR 50:035, Permits, compliance by the affected facilities listed herein with the conditions of this permit shall be deemed to be compliance with all applicable requirements identified in this permit as of the date of issuance of this permit.
16. All previously issued construction and operating permits are hereby subsumed into this permit.

SECTION G - GENERAL CONDITIONS (CONTINUED)**(b) Permit Expiration and Reapplication Requirements**

This permit shall remain in effect for a fixed term of five (5) years following the original date of issue.

Permit expiration shall terminate the source's right to operate unless a timely and complete renewal application has been submitted to the division at least six months prior to the expiration date of the permit. Upon a timely and complete submittal, the authorization to operate within the terms and conditions of this permit, including any permit shield, shall remain in effect beyond the expiration date, until the renewal permit is issued or denied by the division. [401 KAR 50:035, Permits, Section 12]

(c) Permit Revisions

1. A minor permit revision procedure may be used for permit revisions involving the use of economic incentive, marketable permit, emission trading, and other similar approaches, to the extent that these minor permit revision procedures are explicitly provided for in the SIP or in applicable requirements and meet the relevant requirements of Regulation 401 KAR 50:035, Section 15.
2. This permit is not transferable by the permittee. Future owners and operators shall obtain a new permit from the Division for Air Quality. The new permit may be processed as an administrative amendment if no other change in this permit is necessary, and provided that a written agreement containing a specific date for transfer of permit responsibility coverage and liability between the current and new permittee has been submitted to the permitting authority thirty (30) days in advance of the transfer.

**(d) Construction, Start-Up, and Initial Compliance Demonstration Requirements
For EP06, EP12, EP13, EP14, EP15, EP16, and EP17**

1. Construction of process and/or air pollution control equipment authorized by this permit shall be conducted and completed only in compliance with the conditions of this permit.
2. Within thirty (30) days following commencement of construction, and within fifteen (15) days following start-up, and attainment of the maximum production rate specified in the permit application, or within fifteen (15) days following the issuance date of this permit, whichever is later, the permittee shall furnish to the Division for Air Quality's Bowling Green Regional Office in writing, with a copy to the division's Frankfort Central Office, notification of the following:
 - a. The date when construction commenced.
 - b. The date of start-up of the affected facilities listed in this permit.
 - c. The date when the maximum production rate specified in the permit application was achieved.

SECTION G - GENERAL CONDITIONS (CONTINUED)

3. Pursuant to State Regulation 401 KAR 50:035, Permits, Section 13(1), unless construction is commenced within 18 months of the projected construction commencement date in this permit, or if construction is commenced and then stopped for any consecutive period of 18 months or more, or if construction is not completed within eighteen (18) months of the scheduled completion date, then the construction and operating authority granted by this permit for those affected facilities for which construction was not completed shall immediately become invalid. Extensions of the time periods specified herein may be granted by the division upon a satisfactory request showing that an extension is justified.
 4. Operation of the affected facilities for which construction is authorized by this permit shall not commence until compliance with the applicable standards specified herein has been demonstrated pursuant to 401 KAR 50:055, except as provided in Section I of this permit.
 5. This permit shall allow time for the initial start-up, operation, and compliance demonstration of the affected facilities listed herein. However, within sixty (60) days after achieving the maximum production rate at which the affected facilities will be operated but not later than 180 days after initial start-up of such facilities, the permittee shall conduct a compliance demonstration for all permit conditions except testing (in accordance with Regulation 401 KAR 50:055, General compliance requirements) on the affected facilities with testing to be performed at a later date as indicated in Section B of this permit.
 6. Pursuant to Section VII 2.(1) of the policy manual of the Division for Air Quality as referenced by Regulation 401 KAR 50:016, Section 1.(1), at least one month prior to the date of the required performance tests, the permittee shall complete and return a Compliance Test Protocol (Form DEP 6027) to the division's Frankfort Central Office. Pursuant to 401 KAR 50:045, Section 5, the division shall be notified of the actual test date at least ten (10) days prior to the test.
- (e) Acid Rain Program Requirements
1. If an applicable requirement of Federal Statute 42 USC 7401 through 7671q (the Clean Air Act) is more stringent than an applicable requirement promulgated pursuant to Federal Statute 42 USC 7651 through 7651o (Title IV of the Act), both provisions shall apply, and both shall be state and federally enforceable.

SECTION G - GENERAL CONDITIONS (CONTINUED)**(f) Emergency Provisions**

1. An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the permittee demonstrates through properly signed contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and the permittee can identify the cause of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During an emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and,
 - d. The permittee notified the division as promptly as possible and submitted written notice of the emergency to the division within two working days after the time when emission limitations were exceeded due to the emergency. The notice shall meet the requirements of 401 KAR 50:035, Permits, Section 7(1)(e)2, and include a description of the emergency, steps taken to mitigate emissions, and the corrective actions taken. This requirement does not relieve the source of any other local, state or federal notification requirements.
2. Emergency conditions listed in General Condition (f)1 above are in addition to any emergency or upset provision(s) contained in an applicable requirement.
3. In an enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [401 KAR 50:035, Permits, Section 9(3)]

(g) Risk Management Provisions

1. The permittee shall comply with all applicable requirements of 40 CFR Part 68, Risk Management Plan provisions. If required, the permittee shall comply with the Risk Management Program and submit a Risk Management Plan to:
RMP Reporting Center
P.O. Box 3346
Merrifield, VA, 22116-3346
2. If requested, submit additional relevant information to the division or the U.S. EPA.

SECTION G - GENERAL CONDITIONS (CONTINUED)**(h) Ozone depleting substances**

1. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal shall comply with the required practices contained in 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances shall comply with the standards for recycling and recovery equipment contained in 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances shall be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances (as defined at 40 CFR 82.152) shall comply with the recordkeeping requirements pursuant to 40 CFR 82.166.
 - e. Persons owning commercial or industrial process refrigeration equipment shall comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant shall keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
2. If the permittee performs service on motor (fleet) vehicle air conditioners containing ozone-depleting substances, the source shall comply with all applicable requirements as specified in 40 CFR 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

SECTION H - ALTERNATE OPERATING SCENARIOS

N/A

SECTION I - COMPLIANCE SCHEDULE

N/A